

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al.	:	Case No. C-1-02-467
	:	
Plaintiffs,	:	Judge Beckwith
	:	
v.	:	Magistrate Judge Hogan
	:	
AK STEEL CORPORATION	:	DECLARATION OF
	:	<u>JESSICA MORRIS</u>
Defendant.	:	

Jessica Morris truthfully declares that she is competent to testify if called and she further truthfully states of her own personal knowledge as follows.

1. I am currently employed by AK Steel Corporation as a Labor Relations Representative at the Middletown Works. From January 2, 2001 to September 30, 2004, I worked as a human resources representative at the Middletown Works.
2. As a human resources representative at the Middletown Works, I processed the hiring of hourly bargaining unit employees, including being the primary human resources person to administer the test for hourly bargaining unit candidates from February 2001 until April 2003. I continued to assist with the hiring of hourly bargaining unit employees from April 2003 until the bargaining unit hiring freeze which occurred in the fourth quarter 2003.

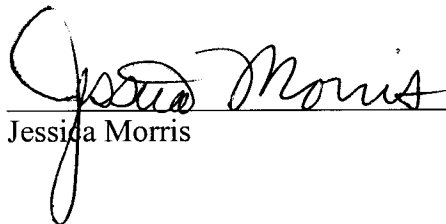
3. As the person who administered the test for hourly bargaining unit candidates, I am familiar with the test. The test which AK Steel used to evaluate hourly bargaining unit candidates took approximately three hours to complete, consisted of seven distinct sections (Pattern Series, Mechanical Reasoning, Reading Comprehension, Industrial Math, Form Pattern Perception, 3-D Reasoning, and Personal Style Inventory), and consisted of 365 questions.

4. When I administered the test in 2001, it was always given in the Human Resources building at the AK Steel plant. Typically, 10 to 30 people took the test at one time. There were two occasions when the test was given to one person individually. On these two occasions, I administered the test to an individual test taker because the individual taking the test had a reading disability which AK Steel accommodated by having me read the test to the test taker.

5. The AK Steel test was never administered at the Palmer Temps office.

I declare under penalty of perjury that the foregoing is true and accurate.

Signed this 16 day of May, 2007.



Jessica Morris